

## Exhibit 3

**To:** [Class Member Email Address]

**From:** info@RealEstateCommissionLitigation.com

**Subject Line:** Residential Real Estate Broker Commissions Antitrust Settlements

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Dear Class Member:

# If you sold a home and paid a commission to a real estate agent, you *may* be a part of class action settlements

*A federal court authorized this Notice.  
It is not from a lawyer. You are not being sued.*

*Para una notificación en español, visite [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com)*

<b>Unique ID:</b>		<b>PIN:</b>	
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This Notice is to inform you that proposed settlements have been reached with Anywhere Real Estate, Inc. f/k/a Realogy Holdings Corp. ("Anywhere"), RE/MAX LLC ("RE/MAX"), and Keller Williams Realty, Inc. ("Keller Williams") resolving certain claims, including in a lawsuit known as *Burnett et al. v. National Association of Realtors, et al.*, Case No. 19-CV-00332-SRB (Western District of Missouri). The lawsuit alleges the existence of an anticompetitive agreement that resulted in home sellers paying inflated commissions to real estate brokers or agents in violation of antitrust law. Defendants include The National Association of Realtors ("NAR") and the following large real estate brokerage firms: Anywhere, RE/MAX, Keller Williams, and Berkshire Hathaway HomeServices. Of these Defendants, the settlements concern only Anywhere, RE/MAX, and Keller Williams. The settlements also resolve claims against Anywhere, RE/MAX, and Keller Williams raised in at least two other lawsuits: *Moehrl et al. v. National Association of Realtors et al.*, Case No. 1:19-cv-01610-ARW (Northern District of Illinois); and *Nosalek v. MLS Property Information Network, Inc., et al.*, Case No. 1:20-cv-12244-PBS (District of Massachusetts). Although the Court has authorized notice to be given of the proposed settlements, this Notice does not express the opinion of the Court on the merits of the claims or defenses asserted by either side of the lawsuit.

Proposed settlements have been reached with Anywhere, RE/MAX, and Keller Williams. Additional settlements may be reached with other Defendants. See [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com) for more information about these settlements and any additional settlements.

## Am I affected?

You are a Settlement Class Member and eligible for payment if you: (1) sold a home during the Eligible Date Range; (2) listed the home that was sold on a multiple listing service ("MLS") anywhere in the United States; and (3) paid a commission to any real estate brokerage in connection with the sale of the home. The Eligible Date Range depends on what MLS you listed

your home for sale on. Go to [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com) to see the Eligible Date Range and to learn more.

## What do the settlements provide?

Anywhere, RE/MAX, and Keller Williams have agreed to pay, collectively, **\$208,500,000** into settlement funds. The funds will be distributed to qualifying Settlement Class Members who submit an approved claim form, after any awarded attorneys' fees, expenses, settlement administration costs, and service awards have been deducted.

## How do I get a payment?

You must submit a claim form, with information pertaining to and/or evidence of your home sale and commissions paid, by **May 9, 2025**. Claim forms can be submitted online at [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com). You can also print a claim form at the website and mail it to *Burnett et al. v. The National Association of Realtors et al.*, c/o JND Legal Administration, PO Box 91479, Seattle, WA 98111, or email it to [info@RealEstateCommissionLitigation.com](mailto:info@RealEstateCommissionLitigation.com).

## What are my other options?

You may object to or exclude yourself (opt-out) from the settlements by **April 13, 2024**, or do nothing. If you exclude yourself, you will *not* receive a settlement payment, but this is the only option that allows you to sue Anywhere, RE/MAX, or Keller Williams for commission prices. If you wish to object, the Court will consider your views in deciding whether to approve or reject the proposed settlements. If the Court does not approve the settlements, no settlement payments will be sent, and the lawsuit will continue. You cannot object if you opt-out. For more information, including how to object or exclude yourself, visit [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com). By doing nothing, you will get no payment, and you will not be able to sue Anywhere, RE/MAX, or Keller Williams for commission prices. If you do not object or exclude yourself, then you will be releasing claims related to the subject matter of these lawsuits. The full terms of the release are contained in the long form notice that is available on [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com).

## What happens next?

The Court will hold a hearing on **May 9, 2024** to consider whether to grant final approval of the settlements and award fees and costs to the attorneys representing the class ("Class Counsel"). The Court has appointed the law firms of Ketchmark and McCreight P.C.; Williams Dirks Dameron LLC; Boulware Law LLC; Hagens Berman Sobol Shapiro LLP; Cohen Milstein Sellers & Toll PLLC; and Susman Godfrey LLP, as Class Counsel. Class Counsel will ask the Court to award an amount not to exceed one-third (33.3%) of the settlement funds, plus out-of-pocket expenses incurred during the case. The Court may award less. Class Counsel will also seek compensation for each current and/or former class representative involved in the actions captioned *Burnett et al. v. The National Association of Realtors et al.*, Case No. 19-CV-00332-SRB, pending in the Western District of Missouri; and *Moehrl et al. v. The National Association of Realtors*, Case No. 19-CV-01610-ARW, pending in the Northern District of Illinois. You will be represented by Class Counsel at the hearing unless you choose to enter an appearance in person or through your own counsel, at your own cost. The appearance of your own attorney is not necessary to participate in the hearing.

## Questions?

This Notice is only a summary. To learn more, visit [www.RealEstateCommissionLitigation.com](http://www.RealEstateCommissionLitigation.com), call toll-free 888-995-0207, email [info@RealEstateCommissionLitigation.com](mailto:info@RealEstateCommissionLitigation.com), or write *Burnett et al. v. The National Association of Realtors et al.*, c/o JND Legal Administration, PO Box 91479, Seattle, WA 98111